

# EXHIBIT C

**From:** [Lamont, Charlotte](#)  
**To:** [Tim White](#)  
**Cc:** [Fuqua, Kelli](#); [Guillory, Marlo](#); [Mendoza, Sandra](#); [Lapriore, Steven](#)  
**Subject:** RE: [External] XTO/Glass - Pretrial Deadlines  
**Date:** Tuesday, November 1, 2022 3:32:59 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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Yes, thank you Tim.

**Charlotte Lamont**

Shareholder

505.944.9682 direct, 505.379.6057 mobile, 505.213.0415 fax

CLamont@littler.com

Pronouns: She/Her



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**From:** Tim White <tim@valdezwhite.com>  
**Sent:** Tuesday, November 1, 2022 11:45 AM  
**To:** Lamont, Charlotte <CLamont@littler.com>  
**Cc:** Fuqua, Kelli <KFuqua@littler.com>; Guillory, Marlo <MGuillory@littler.com>; Mendoza, Sandra <SMendoza@littler.com>; Lapriore, Steven <SLapriore@littler.com>  
**Subject:** RE: [External] XTO/Glass - Pretrial Deadlines

I can make your first proposal work. You are preparing the motion?

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Timothy L. White - Attorney  
Valdez & White Law Firm, LLC

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**From:** Lamont, Charlotte <[CLamont@littler.com](mailto:CLamont@littler.com)>  
**Sent:** Monday, October 31, 2022 4:37 PM  
**To:** Tim White <[tim@valdezwhite.com](mailto:tim@valdezwhite.com)>  
**Cc:** Fuqua, Kelli <[KFuqua@littler.com](mailto:KFuqua@littler.com)>; Guillory, Marlo <[MGuillory@littler.com](mailto:MGuillory@littler.com)>; Mendoza, Sandra <[SMendoza@littler.com](mailto:SMendoza@littler.com)>; Lapriore, Steven <[SLapriore@littler.com](mailto:SLapriore@littler.com)>  
**Subject:** RE: [External] XTO/Glass - Pretrial Deadlines

Thank you Tim, we appreciate it.

**Charlotte Lamont**

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**From:** Tim White <[tim@valdezwhite.com](mailto:tim@valdezwhite.com)>  
**Sent:** Monday, October 31, 2022 4:17 PM  
**To:** Lamont, Charlotte <[CLamont@littler.com](mailto:CLamont@littler.com)>  
**Subject:** RE: [External] XTO/Glass - Pretrial Deadlines

**[EXTERNAL E-MAIL]**

I will get back to you first thing tomorrow

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**From:** Lamont, Charlotte <[CLamont@littler.com](mailto:CLamont@littler.com)>  
**Sent:** Monday, October 31, 2022 4:15 PM  
**To:** Tim White <[tim@valdezwhite.com](mailto:tim@valdezwhite.com)>  
**Cc:** Fuqua, Kelli <[KFuqua@littler.com](mailto:KFuqua@littler.com)>; Guillory, Marlo <[MGuillory@littler.com](mailto:MGuillory@littler.com)>; Mendoza, Sandra <[SMendoza@littler.com](mailto:SMendoza@littler.com)>; Lapriore, Steven <[SLapriore@littler.com](mailto:SLapriore@littler.com)>  
**Subject:** RE: [External] XTO/Glass - Pretrial Deadlines

Hi Tim,

XTO only agrees to an extension of the deadlines on the terms I proposed earlier, with limited discovery available to both parties. It is not willing to expand the scope of discovery during the proposed extended discovery period. The extension would be intended to allow the parties to conduct the limited discovery we discussed earlier today.

The alleged inability to reach these oil field worker witnesses, including your client, has not changed since plaintiff filed this suit sixteen months ago. Please let us know if you agree to XTO's proposal by noon tomorrow, in light of the impending deadline to file discovery motions. If you do not agree to the proposal, we will file our motion to dismiss or compel and note your opposition.

Best regards,

Charlotte

**Charlotte Lamont**

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**From:** Tim White <[tim@valdezwhite.com](mailto:tim@valdezwhite.com)>  
**Sent:** Monday, October 31, 2022 3:52 PM

**To:** Lamont, Charlotte <[CLamont@littler.com](mailto:CLamont@littler.com)>

**Cc:** Fuqua, Kelli <[KFuqua@littler.com](mailto:KFuqua@littler.com)>; Guillory, Marlo <[MGuillory@littler.com](mailto:MGuillory@littler.com)>; Mendoza, Sandra <[SMendoza@littler.com](mailto:SMendoza@littler.com)>; Lapriore, Steven <[SLapriore@littler.com](mailto:SLapriore@littler.com)>

**Subject:** RE: XTO/Glass - Pretrial Deadlines

This is agreeable to me with the caveat that if the depositions we take reveal good cause to take others for purposes of preserving trial testimony given how all these folks work out in the field such that its hard to contact them/get them served with subpoenas to compel attendance at trial, we reserve the right to try to obtain such discovery.

Tim

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**From:** Lamont, Charlotte <[CLamont@littler.com](mailto:CLamont@littler.com)>

**Sent:** Monday, October 31, 2022 3:48 PM

**To:** Tim White <[tim@valdezwhite.com](mailto:tim@valdezwhite.com)>

**Cc:** Fuqua, Kelli <[KFuqua@littler.com](mailto:KFuqua@littler.com)>; Guillory, Marlo <[MGuillory@littler.com](mailto:MGuillory@littler.com)>; Mendoza, Sandra <[SMendoza@littler.com](mailto:SMendoza@littler.com)>; Lapriore, Steven <[SLapriore@littler.com](mailto:SLapriore@littler.com)>

**Subject:** [External] XTO/Glass - Pretrial Deadlines

Hi Tim,

We appreciate your time on our call this morning. Again, Kelli and I were very sorry to hear the tragic story of Suzanna's attack and its lasting impact.

XTO will agree to push all pretrial case deadlines out 60 days with the following limitations on any further discovery:

1. XTO may depose plaintiff.
2. The parties may depose Tommy Criddle.

3. Plaintiff may take the deposition of one XTO 30(b)(6) representative on the sole topic of XTO's general procedures in responding to an employee's request for accommodation.

Please let us know if this is acceptable to you. If so, we should file our joint motion and proposed order before Friday, and we will draft the same for your review.

Best regards,

Charlotte

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